

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TEXAS A&M QUEER EMPOWERMENT  
COUNCIL,

*Plaintiffs,*

v.

WILLIAM “BILL” MAHOMES, ROBERT L.  
ALBRITTON, DAVID C. BAGGETT, JOHN  
W. BELLINGER, JAMES R. “RANDY”  
BROOKS, JAY GRAHAM, MICHAEL A.  
“MIKE” HERNANDEZ III, MICHAEL J.  
PLANK, SAM TORN, and CAGE SAWYERS  
in their official capacities as members of the  
Board of Regents of the Texas A&M University  
System;

JOHN SHARP, in his official capacity as  
Chancellor of the Texas A&M University  
System, and

MARK A. WELSH III, in his official capacity  
as President of Texas A&M University,  
Defendants.

*Defendants.*

CASE NO. 4:25-cv-992

---

NOTICE OF APPEARANCE OF LEAD COUNSEL

---

Defendants WILLIAM MAHOMES, ROBERT L. ALBRITTON, DAVID C. BAGGETT, JOHN W.  
BELLINGER, JAMES R. BROOKS, JAY GRAHAM, MICHAEL A. HERNANDEZ III, MICHAEL J. PLANK,  
SAM TORN, AND CAGE SAWYERS, in their official capacities as members for the Board of Regents  
of Texas A&M University System; JOHN SHARP, in his official capacity as Chancellor of Texas

A&M University, and MARK A. WELSH III, in his official capacity as President of Texas A&M University files this Notice of Appearance of Lead Counsel and hereby notifies the Court that Special Counsel Zachary Berg will appear as lead counsel for Defendants in the above-captioned case. Mr. Berg is admitted to practice in this Court and is a member in good standing with the State Bar of Texas.

Defendants respectfully requests that the parties and the Court copy Mr. Berg on all future papers filed or served in this action.

Dated March 7, 2025.

Respectfully submitted.

**KEN PAXTON**  
Attorney General

/s/ Zachary Berg  
**ZACHARY BERG**  
Special Counsel  
Tex. State Bar No. 24107706  
SDTX No. 3481711

**BRENT WEBSTER**  
First Assistant Attorney General

**MARK A. CSOROS**  
Assistant Attorney General  
Texas State Bar No. 24142814  
SDTX No. 3896171

**RALPH MOLINA**  
Deputy First Assistant Attorney General

**RYAN G. KERCHER**  
Chief, Special Litigation Division  
Texas Bar No. 24060998  
SDTX No. 882329

**RYAN D. WALTERS**  
Deputy Attorney General for Legal Strategy

OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
Special Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Tel.: (512) 463-2100  
Zachary.Berg@oag.texas.gov  
Mark.Csoros@oag.texas.gov  
Ryan.Kercher@oag.texas.gov

**COUNSEL FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2025, a true and correct copy of the foregoing document was served on all counsels of record.

/s/ Zachary Berg  
**ZACHARY BERG**